REMARKS

Claims 1-56 are pending in this application, with claims 1, 10, 21, 32 and 38 being independent. Claims 1, 10, 21, 32-38 and 50 have been amended. Claims 52-56 have been added. Favorable reconsideration and allowance are respectfully requested

Claims 32-37 were rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Without conceding the propriety of the rejection, those claims have been amended in an effort to expedite the allowance of this application.

Claims 1-51 were rejected under 35 U.S.C. § 103(a) as being obvious from U.S. Patent No. 5,500,934 to Austin et al. in view of U.S. Patent No. 6,154,465 to Pickett. These rejections are respectfully traversed.

As a threshold matter, applicants gratefully acknowledge the courtesies extended by the Examiner during the July 21, 2005, telephonic Interview. During the Interview, applicants' representative explained that neither Austin nor Pickett, nor their combination, teach or suggest the salient features of the present invention, because among other things, and as discussed below, neither relates to a frame in a telecommunications system.

As recited in independent claim 1, the present invention relates to a method of presenting to a user a visual representation of a frame. A frame is a term of art in a telecommunications system, and refers to a physical structure located at a central office, laid out in a matrix of blocks, with each block laid in a matrix of pins. Method claim 1 recites steps that are specific to a telecommunications frame. For example, the method includes the step of maintaining in a database data describing the frame, including (a) data uniquely identifying

blocks in the frame, and (b) data describing a current condition of the frame, including data indicating which pins in the frame are currently in use and which pins in the frame are currently available for use

Other steps of method claim 1, which are also specific to a telecommunications frame, include accessing the database to determine the current condition of the frame and displaying a graphical representation of the frame. The graphical representation includes a visual indication of the current condition of the frame, including a visual indication of a plurality of pins currently in use and a plurality of pins available for use. The method further includes allowing a user to interact with the graphical representation to effect a mapping between available pins on the frame and telecommunications lines leading to and from the frame.

Independent claims 10 and 32 are directed to a program storage device having computer executable software code for host and client computers, respectively. Independent claim 21 is directed to a server computer. Independent claim 38 is directed to an apparatus, and is drafted in means-plus-function form. All relate specifically to a frame in a telecommunications system, and describe a database that maintains data describing a frame, including data uniquely identifying blocks in the frame and data describing a current condition of the frame, as discussed above with respect to claim 1.

The Office Action concedes that Austin does not teach a telecommunications frame, and looks to the newly cited Pickett reference to correct that deficiency. But Pickett also does not teach or suggest a telecommunications frame. To the contrary, the so-called "chassis

view window" illustrated in Pickett's Fig. 16 is of a very different structure, specifically of a Private Branch Exchange (PBX) device.

A PBX is a private telephone switching system, typically located at a customer's premises. It is not anything like, and in fact is completely different from, a telecommunications frame located at a central office. For example, for the PBX device of Pickett, the chassis view includes a visual representation of station cards, resource cards, power supplies and drives, since those are its constituent components. See Pickett at col. 41:34-35. A PBX device is not laid out in a matrix of blocks, with each block laid out in a matrix of pins, as is the case with a telecommunications frame. And because the Pickett does not relate to a telecommunications frame, it does not of course provide a graphical representation of a frame that includes a visual indication of available pins, and does not allow a user to effect a mapping between available pins and telecommunication lines.

Pickett also does not teach or suggest anything like a database that maintains data describing a frame, including (a) data uniquely identifying blocks in the frame and (b) data describing a current condition of the frame, including data indicating which pins in the frame are currently in use and which pins in the frame are currently available for use. Since such data are unique to telecommunications frames, and since Pickett relates to a PBX device and not a telecommunications frame, it does not and cannot show a database that maintains such data.

Accordingly, Applicants respectfully submit that independent claims 1, 10, 21, 32 and 38 are plainly allowable over Pickett and Austin, and respectfully request the Examiner to remove the Section 103 rejection.

The remaining claims all depend from one of independent Claims 1, 10, 21, 32 and 38, and each partakes in the novelty and non-obviousness of its respective base claims. The dependent claims also recite additional patentable features of the present invention, and individual reconsideration of each is respectfully requested.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and passage to issue of the present application.

If there are any fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 07-2347. If an extension of time under 37 C.F.R. § 1.136 not accounted for above is required, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

Joel Wali

Reg. No. 25,648

Date: August 5, 2005

c/o Christian R. Andersen VERIZON CORPORATE SERVICES GROUP. INC. HQE03H14 600 Hidden Ridge Drive Irving, TX 75038 (972) 718 - 4800